

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KIMBERLY HUDSON-BRYANT,)	No. 4:25-cv-244
individually and on behalf of all others)	
similarly situated,)	
)	
Plaintiff,)	
)	
v.)	
)	
ONDERLAW, LLC,)	
)	
Defendant.)	

DEFENDANT ONDERLAW, LLC’S MOTION FOR JUDGMENT ON THE PLEADINGS

COMES NOW Defendant OnderLaw, LLC, by and through the undersigned counsel, and pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, submits its Motion for Judgment on the Pleadings. In support of this Motion, Defendant states as follows:

1. On February 27, 2025, Plaintiff filed a one-count Complaint alleging a violation of the Telephone Consumer Protection Act of 1991 (“TCPA”). Plaintiff also purported to bring her claims on behalf of a class.
2. Plaintiff and the putative class’s claims are barred on the face of the Complaint because the allegations of the Complaint fail to establish that the messages Plaintiff received were telephone solicitations as defined by 47 U.S.C. § 227(a)(4).
3. Accordingly, Plaintiff failed to state a claim under 47 U.S.C. § 227(c)(5) and 47 C.F.R. § 64.1200(c).
4. Defendant incorporates by reference the memorandum of law filed simultaneously herewith.

WHEREFORE, Defendant OnderLaw, LLC moves this Court to enter judgment for Defendant, dismissing Plaintiff's Complaint with prejudice and for such other relief as this Court deems just and proper.

ONDERLAW, LLC

By /s/ Martin L. Daesch
Martin L. Daesch, #40494
Kaitlin A. Carpenter, #74599
110 E. Lockwood
St. Louis, MO 63119
(314) 963-9000
(314) 963-1700 facsimile
daesch@onderlaw.com
carpenter@onderlaw.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned certifies the foregoing document was electronically filed with the Clerk of the Court, to be served by operation of the Court's electronic filing system upon all attorneys of record on this 16th day of June, 2025.

/s/ Martin L. Daesch